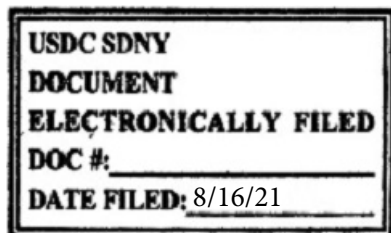


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August 13, 2021

VIA ECF

Honorable Barbara Moses
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 100071

MEMO ENDORSED

Re: *Boland v. Commissioner of Social Security*,
Civil Action No. 1:20-cv-07312-ER-BCM

Dear Judge Moses,

We write on behalf of plaintiff, Daniel M. Boland, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is currently due on August 18, 2021. Plaintiff respectfully requests an extension of time up to and including October 17, 2021. This is plaintiff's first request for an extension.

The additional time is necessary because our office has numerous closely scheduled (and overlapping) deadlines in social security matters. For several months we received countless requests from the Agency for additional time to serve administrative records because of delays the Agency was encountering in getting records prepared. We believe that the Agency has mostly emerged from this backlog, but it has had the unintended effect of creating a backlog on our end. For example, our office has over a dozen briefs due between August 13, 2021, and August 20, 2021.

Honorable Barbara Moses
August 13, 2021
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Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to serve her motion for judgment on the pleadings on or before **October 17, 2021**;
- b. Defendant to serve its response/cross-motion on or before **December 16, 2021**; and
- c. Plaintiff to serve her reply (if any) on or before **January 6, 2022**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Susan Baird, Esq. (by ECF)

Application GRANTED IN PART. Plaintiff shall file her motion for judgment on the pleadings no later than **September 20, 2021**. The Commissioner shall file her response, and any cross-motion, no later than **November 22, 2021**. Plaintiff shall file her reply, if any, no later than **December 13, 2021**. Given the delays in filing the e-CAR, no further extensions of either party's briefing deadlines will be granted absent compelling circumstances.



Barbara Moses
United States Magistrate Judge
August 16, 2021